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Attorneys for Plaintiffs and the Proposed Class

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

**DONALD WORTMAN, WILLIAM
 ADAMS, MARGARET GARCIA,**
 individually and on behalf of all others
 similarly situated,

Plaintiffs,

vs.

**AIR NEW ZEALAND, ALL NIPPON
 AIRWAYS, CATHAY PACIFIC
 AIRWAYS, CHINA AIRLINES, EVA
 AIRWAYS, JAPAN AIRLINES
 INTERNATIONAL, MALAYSIA
 AIRLINES, NORTHWEST AIRLINES,
 QANTAS AIRWAYS, SINGAPORE
 AIRLINES, THAI AIRWAYS,
 UNITED AIRLINES,**

Defendants

Case No. 07-cv-05634-CRB

MDL No. 1913

**DECLARATION OF STEVEN N.
 WILLIAMS IN SUPPORT OF PLAINTIFF
 WORTMAN, ADAMS AND GARCIA'S
 ADMINISTRATIVE MOTION FOR
 RELIEF PURSUANT TO LOCAL RULE 7-
 11 FOR DESIGNATION OF A
 PLACEHOLDER COMPLAINT AND
 SUMMONS**

**DECLARATION OF STEVEN N. WILLIAMS IN SUPPORT OF PLAINTIFF
 WORTMAN, ADAMS AND GARCIA'S ADMINISTRATIVE MOTION FOR RELIEF
 PURSUANT TO LOCAL RULE 7-11 FOR DESIGNATION OF A PLACEHOLDER
 COMPLAINT AND SUMMONS**

Case No. 07-cv-05634-CRB; MDL No. 1913

1 I, Steven Williams, declare:

2 1. I am an attorney duly licensed by the State of California and am admitted to
3 practice before this Court. I am a partner of the law firm of Cotchett, Pitre & McCarthy
4 (“CPM”), attorneys of record for plaintiffs Donald Wortman, William Adams and Margaret
5 Garcia. The matters set forth herein are within my personal knowledge, and if called and sworn
6 as a witness I could competently testify regarding them. I make this declaration pursuant to
7 Local Rule 7-11.

8 2. I submit this Declaration in support of Plaintiffs Donald Wortman, William
9 Adams and Margaret Garcia’s Administrative Motion for Relief Pursuant to Local Rule 7-11 for
10 Designation of a Placeholder Complaint and Summons.

11 3. Plaintiffs’ have been working with a process server to serve the complaint,
12 summons and other supporting documents to all defendants located outside the United States.

13 4. Defendant Cathay Pacific Airways is located in Hong Kong.

14 5. Defendants in Hong Kong require service through the Hague Convention.

15 6. Defendants China Airlines and EVA Airways are located in Taiwan.

16 7. Defendants located in Taiwan require service through a Letter Rogatory.

17 8. For service in Hong Kong, a special administrative region of the People’s
18 Republic of China (“PRC”), the local authorities refuse to accept or serve any Hague Request
19 with pleadings that imply that Hong Kong is not a part of China or that imply that Taiwan is not
20 a part of China.

21 9. For service in Taiwan, also known as Republic of China (“ROC”), the
22 designations “Republic of China,” “ROC,” or any references to the “State” or “Nation” of
23 Taiwan cannot be included in the pleadings or in the Letter Rogatory (due to the United States’
24 diplomatic relations with these foreign entities). If such language is contained in those
25 documents, it must be removed, since such references are a diplomatic faux pas and will result
26 in the U.S. State Department’s refusal to handle the documents.

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28 **DECLARATION OF STEVEN N. WILLIAMS IN SUPPORT OF PLAINTIFF
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1 10. Our office contacted the respective attorneys for Cathay Pacific, China Airlines, and
2 EVA Airways regarding the relief sought in this motion and requested a stipulation to such
3 relief. Each attorney indicated that it was not authorized to enter into such a stipulation.

4 I declare under penalty of perjury that the foregoing is true and correct. Executed this 10
5 day of January 2008, at Burlingame, California.

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10 Steven N. Williams

11 *Attorney for Plaintiffs Wortman, Adams and*
12 *Garcia and the Proposed Class*
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28 **DECLARATION OF STEVEN N. WILLIAMS IN SUPPORT OF PLAINTIFF
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